

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No. 04-10288-NG
	)	
v.	)	<b>VIOLATIONS:</b>
	)	
1) CARLOS ESPINOLA,	)	21 U.S.C. § 846 - Conspiracy
2) JOSE MELO,	)	Possess with Intent to
3) JOSEPH BALDASSANO,	)	Distribute, and to Distribute,
4) MATTHEW CREAM,	)	Oxycodone
5) JASON MATTHEWS,	)	
6) JOSEPH ALLEN,	)	21 U.S.C. § 841(a)(1) -
7) KEITH BEHSMAN,	)	Distribution of Oxycodone
8) JONATHAN MITCHELL,	)	
9) JAMES GARDNER,	)	21 U.S.C. § 860(a) -
10) PHILIP ALBERT, JR.,	)	Distribution of Oxycodone
11) JARED KNOWLTON,	)	Within a Public Housing
12) ARCHIBALD MACLEOD,	)	Authority
13) GUISEPPE TORRENTE	)	
Defendants.	)	18 U.S.C. § 2 - Aiding and
	)	Abetting
	)	
	)	21 U.S.C. § 853 - Criminal
	)	Forfeiture Allegation

**UNITED STATES' BILL OF PARTICULARS**  
**FOR FORFEITURE OF ASSETS**

The United States of America, by and through its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

The Forfeiture Allegation of the Indictment seeks forfeiture, pursuant to 21 U.S.C. § 853 as a result of violations of 21 U.S.C. §§ 841 and 846, of any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or

part, to commit, or to facilitate the commission of, such violations, including, but not limited to the following:

- 1) \$7,961.00 in United States Currency, seized from Joseph Baldassano, on or about June 29, 2004.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Shelbey D. Wright  
DAVID G. TOBIN  
SHELBEY D. WRIGHT  
Assistant U.S. Attorneys  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3100

Dated: November 4, 2004

#### CERTIFICATE OF SERVICE

I certify that I have served a true copy of the foregoing upon Elliot M. Weinstein, Esquire, 228 Lewis Wharf, Boston, Massachusetts 02110, as counsel for Defendant Joseph Baldassano, by first class mail, postage prepaid.

/s/ Shelbey D. Wright  
Shelbey D. Wright  
Assistant U.S. Attorney

Dated: November 4, 2004